

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Terrence L. Howard,

Debtor.

Case No. 23-13369-AMC
Chapter 13
Related to ECF No. 28

Objection to Motion for Relief from the Automatic Stay

Debtor Terrence L. Howard, through his attorney, objects to the Motion for Relief from the Automatic Stay filed by Movant Nationstar Mortgage LLC.

1. The Debtor can cure the purported arrearage through the chapter 13 plan or by making direct payments to the Movant.

2. If the Court grants the Motion notwithstanding this objection, it must not grant relief further than modifying the automatic stay to permit the Movant to enforce its *in rem* rights under applicable nonbankruptcy law with respect to the property located at 7127 Guyer Ave, Philadelphia, PA. *See* 11 U.S.C. § 362 (c)(1).

For those reasons, the Court must enter relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: June 9, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: 

Mike Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com

Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: June 9, 2024



Mike Assad